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10 *Chase National Corporate Services, Inc.*

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re Ex Parte Application of

15 OLANREWAJU SURAJU and THE HUMAN
16 AND ENVIRONMENTAL DEVELOPMENT
17 AGENDA,

18 Applicants,

19 For an Order Pursuant to 28 U.S.C. § 1782
20 Granting Leave to Obtain Discovery from

21 YAHOO!, INC. and J.P. MORGAN CHASE,
22 INC.,

23 Respondents,

24 For use in Foreign Proceedings.
25
26
27
28

CASE NO. 3:22-mc-80072-SK

**DECLARATION OF ANDREW SOUKUP
IN SUPPORT OF J.P. MORGAN CHASE
NATIONAL CORPORATE SERVICES,
INC.'S OPPOSITION TO APPLICATION
FOR LEAVE TO OBTAIN DISCOVERY
UNDER 28 U.S.C. § 1782**

1 I, Andrew Soukup, declare as follows:

2 1. I am an attorney at Covington & Burling LLP, counsel for Respondent J.P. Morgan Chase
3 National Corporate Services, Inc. in this action. I have personal knowledge of the facts set forth herein
4 and, if called upon to testify, could and would testify competently thereto.

5 2. I submit this declaration in support of J.P. Morgan Chase National Corporate Services,
6 Inc.'s Opposition to the Application for Leave to Obtain Discovery Under 28 U.S.C. § 1782 filed by
7 Applicants Olanrewaju Suraju and the Human and Environmental Development Agenda.

8 3. Attached as **Exhibit 1** is a true and correct copy of a letter from Paul Hoffman, Catherine
9 Sweetser, and John Washington of Schonbrun Seplow Harris Hoffman & Zeldes LLP, to Stacey Friedman,
10 Executive Vice President and General Counsel, JPMorgan Chase & Co., dated November 22, 2021.

11 4. Attached as **Exhibit 2** is true and correct copy of an email from Andrew Soukup, Covington
12 & Burling LLP, to Catherine Sweetser, Schonbrun Seplow Harris Hoffman & Zeldes LLP, dated March
13 2, 2022.

14 5. Attached as **Exhibit 3** is a true and correct copy of an email (with attachment) from
15 Catherine Sweetser, Schonbrun Seplow Harris Hoffman & Zeldes LLP, to Jordan Moran, Covington &
16 Burling LLP, dated December 13, 2021.

17 6. Attached as **Exhibit 4** is a true and correct copy of an email (with attachments) from
18 Catherine Sweetser, Schonbrun Seplow Harris Hoffman & Zeldes LLP, to Andrew Soukup, Covington &
19 Burling LLP, dated January 26, 2022.

20 7. Attached as **Exhibit 5** is a true and correct copy of a Certificate identifying J.P. Morgan
21 Chase National Corporate Services, Inc.'s place of incorporation and principal place of business, which I
22 was provided by my client in this matter.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on June 8, 2022

3
4 By: 
5 Andrew Soukup